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15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17 ProDox, LLC, an Arizona limited liability  
18 company,

19 Plaintiff,

20 vs.

21 Professional Document Services, Inc. d/b/a  
22 ProDoc-Kytel, a California Corporation

23 Defendant.

Case No.: 2:20-CV-02035-JAD-NJK

**STIPULATION AND ORDER TO  
EXTEND TIME TO FILE REPLY IN  
SUPPORT OF MOTION TO  
CALCULATE EXPENSES (ECF 96)**

**(First Request)**

24 Plaintiff ProDox, LLC ("Plaintiff") and Defendant Professional Document Services, Inc.,  
25 dba ProDoc-Kytel ("Defendant"), by and through their respective counsel, hereby jointly stipulate  
26 pursuant to LR IA 6-1 to extend the deadline for Plaintiff to file a reply in support of its  
27 Motion to Calculate Expenses (ECF 96/110) from August 3, 2022, to August 16, 2022. This  
28 is the first request to extend this deadline.

The undersigned counsel was tasked by Plaintiff to prepare the reply that is the subject of  
this stipulation. Plaintiff is seeking this deadline because commencing on August 1, 2022, and  
continuing through August 10, 2022, the undersigned counsel has been and will be required to  
attend to an emergency injunction motion filed against another client in a case pending in the

Western District for the Federal District of Washington, where the undersigned counsel is the only attorney substantively representing that client in a complex copyright infringement action. This WAWD emergency practice has precluded counsel from preparing the reply that is the subject of this stipulation and will prevent counsel from doing so until after August 10<sup>th</sup>. Absent the stipulated extension, therefore, Plaintiff will be prejudiced by not having the ability to have counsel represent Plaintiff in the preparation of the subject reply.

Defendant has agreed to this extension without waiver of its argument, as set forth in its Response, that Plaintiff's Motion to Calculate Expenses was untimely.

DATED: August 3, 2022.

**BLAKELY LAW GROUP**

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*Attorneys for Plaintiff ProDox, LLC*

**IT IS SO ORDERED**

  
UNITED STATES MAGISTRATE JUDGE

DATED: August 4, 2022